

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

In re	:	Chapter 11
	:	
W.R. Grace & Co., <i>et al.</i>	:	Case No. 01-01139 JKF
	:	
Debtors.	:	Docket Reference No. 20872

**PHASE II TRIAL BRIEF OF GOVERNMENT EMPLOYEES INSURANCE COMPANY AND
REPUBLIC INSURANCE COMPANY N/K/A STARR INDEMNITY & LIABILITY COMPANY IN
OPPOSITION TO CONFIRMATION OF AMENDED JOINT PLAN OF REORGANIZATION**

On June 1, 2009, Government Employees Insurance Company (“GEICO”) and Republic Insurance Company n/k/a Starr Indemnity & Liability Company (“Republic”) filed their Phase I Trial Brief. (*See* D.I. 21943). In that brief, due to uncertainty regarding the plan objections to be addressed in Phase I of the Confirmation Hearing versus those to be addressed in Phase II – which was largely caused by the Plan Proponents’ ever-shifting positions on the subject – GEICO and Republic elected to address both their Phase I and Phase II Plan Objections.

Accordingly, GEICO and Republic hereby incorporate their Phase I Trial Brief as their Phase II Trial Brief with respect to their Phase II Objections.

Dated: July 13, 2009

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